

**To:** Grantham, Nancy[Grantham.Nancy@epa.gov]  
**From:** Deegan, Dave  
**Sent:** Wed 8/26/2015 11:58:09 PM  
**Subject:** Fwd: PCB removal and disposal.

Wanted to make sure you are aware of this inquiry to HQ from the CT TV reporter.

D.

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Dave Deegan  
U.S. EPA Region 1  
Office of Public Affairs  
o: 617.918.1017  
m: 617.594.7068

Begin forwarded message:

**From:** "DesRoches, David" <[ddesroches@wnpr.org](mailto:ddesroches@wnpr.org)>  
**Date:** August 26, 2015 at 5:18:53 PM EDT  
**To:** "Valentine, Julia" <[Valentine.Julia@epa.gov](mailto:Valentine.Julia@epa.gov)>  
**Cc:** "Milbourn, Cathy" <[Milbourn.Cathy@epa.gov](mailto:Milbourn.Cathy@epa.gov)>, "Deegan, Dave" <[Deegan.Dave@epa.gov](mailto:Deegan.Dave@epa.gov)>, "Hull, George" <[Hull.George@epa.gov](mailto:Hull.George@epa.gov)>  
**Subject: RE: PCB removal and disposal.**

Julie,

Is anybody preparing any answers to this? Again, I know there's lots going on over there, but this is an important issue that deserves attention.

Since you've updated your FAQs to schools about caulk, answering questions 3 and 4 is unnecessary, though I would like an explanation for the decision to relax testing protocols, and address the claims made by the Public Employees for Environmental Responsibility, which state that the new guidance "is worrisome because it de-emphasizes testing for the materials in the locations most likely to contain the chemicals" and that the recent change in guidance "discourages schools from testing for PCBs in caulk."

Please respond at your earliest convenience. Thanks for your time,

david

David DesRoches

Education Reporter

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**From:** DesRoches, David  
**Sent:** Monday, August 24, 2015 2:04 PM  
**To:** 'Valentine, Julia'  
**Cc:** 'Milbourn, Cathy'; 'Deegan, Dave'; 'Hull, George'  
**Subject:** RE: PCB removal and disposal.

Julie,

Just checking on this. I know you guys are busy, but could someone get back to me soon? I really think it's important for you guys to weigh-in. Please feel free to touch on any difficulties EPA has in terms of resources or support that might make it difficult for EPA to regulate PCBs and other chemicals.

David DesRoches

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**From:** DesRoches, David  
**Sent:** Wednesday, August 19, 2015 1:47 PM  
**To:** 'Valentine, Julia'  
**Cc:** Milbourn, Cathy; Deegan, Dave; Hull, George  
**Subject:** RE: PCB removal and disposal.

Julie – Here are my questions. I understand it may take some time to gather answers. Could you give me an estimate of when I could expect something? Would the end of this week be possible?

Thank you for your time and attention to this. It's very much appreciated.

1. Where did the 50 ppm standard come from?
2. Why does the EPA and CDC list PCBs as a probable human carcinogen when the WHO lists it as a carcinogen?
3. Is EPA considering updating its recommendation to schools regarding PCB management? If so, how?
4. Is EPA considering requiring schools that were built or renovated between 1950 and 1979 to be tested for PCBs (treating it like lead and asbestos), instead of recommending testing? If not, why not? If so, would this requirement only apply to areas slated for renovation, or for the entire school?

5. Can states require schools to test for PCBs, or does TSCA prevent states from requiring testing?
6. Given that EPA does not have a testing requirement, yet set the threshold of 50 ppm as the point beyond which “unreasonable risk or injury to health” would occur, how are building owners and school boards to take this health risk seriously?
7. Could current EPA recommendations to building owners likely result in a failure of building owners to remediate high levels of PCBs, since they will never be discovered?
8. How could building owners or EPA know which schools or other buildings pose a health hazard unless they test?
9. Does the EPA recommend monitoring possibly contaminated materials instead of removing them? What is the rationale for this recommendation?
10. If a school finds PCBs in caulk or other building materials above the regulatory limit, what is a building owner required to remove: A) just a portion of what was sampled; B) all of that material in a particular area such as the caulking in a window; C) all like-kind and like-age materials in the same room; D) or all like-kind and like-age materials in the same building constructed at the same time? How does the required removal guarantee clean boundaries?
11. Do the EPA regulations take away from the intent of TCSA, which was to get rid of PCBs completely? Why or why not?
12. Why are there so many authorized uses for PCBs still in the regulations? Wasn’t the intent to rid all of them unless EPA was petitioned to keep a use?
13. Is the EPA considering eliminating and/or adding authorized uses for PCBs?

14. Can a person or company or government purchase or import from another country, or state, a product that contains PCBs and is also an authorized use of PCBs?
15. Can a school remove a confirmed source of PCBs without EPA's approval?
16. How much leeway is given to states to further restrict the regulation and remediation and testing of and for PCBs?
17. The EPA recently updated its FAQs on PCBs in building materials (July 28, 2015). Could you explain how this differs from previous advice given in earlier FAQs?

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**From:** Valentine, Julia [<mailto:Valentine.Julia@epa.gov>]  
**Sent:** Wednesday, August 19, 2015 11:48 AM  
**To:** DesRoches, David  
**Cc:** Milbourn, Cathy; Deegan, Dave; Hull, George  
**Subject:** Re: PCB removal and disposal.

Hi David, I'll check w the program again.

With the response to Gold King Mine being handled by the same office we may not be able to provide an interview. What key questions would you like answered in writing?

Also, please take a look at this link:

<http://www.epa.gov/epawaste/hazard/tsd/pcbs/index.htm>

Sent from USEPA iPhone

On Aug 19, 2015, at 10:26 AM, DesRoches, David <[ddesroches@wnpr.org](mailto:ddesroches@wnpr.org)> wrote:

Hi Julia, Any updates? If someone is around today, that would be great. It's getting down to the wire, and I really think it's important to have someone from the EPA weigh-in on this. It's a comprehensive series about PCBs, so someone in a top position who knows about this stuff would be ideal.

David DesRoches

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**From:** Valentine, Julia [mailto:[Valentine.Julia@epa.gov](mailto:Valentine.Julia@epa.gov)]  
**Sent:** Tuesday, August 18, 2015 2:59 PM  
**To:** DesRoches, David  
**Cc:** Milbourn, Cathy; Deegan, Dave; Hull, George  
**Subject:** Re: PCB removal and disposal.

I'll check in this

Sent from USEPA iPhone

On Aug 18, 2015, at 2:42 PM, DesRoches, David <[ddesroches@wnpr.org](mailto:ddesroches@wnpr.org)> wrote:

Thank you. I was also hoping to talk to someone about EPA's health risk assessment, which is different from the WHO's assessment. I also had some policy questions about the regs. If there's a single person who could field these questions that would be great. I would like to avoid wasting your time arranging interviews with multiple people!

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**From:** Milbourn, Cathy [mailto:[Milbourn.Cathy@epa.gov](mailto:Milbourn.Cathy@epa.gov)]  
**Sent:** Tuesday, August 18, 2015 2:34 PM  
**To:** DesRoches, David  
**Cc:** Deegan, Dave; Valentine, Julia; Hull, George  
**Subject:** PCB removal and disposal.

Hi David. The removal and disposal of pcb's is an issue for the solid waste and emergency response program. Julia valentine handles that issue. She is copied here.

Cathy

Sent from my iPhone

On Aug 18, 2015, at 2:20 PM, "Milbourn, Cathy" <[Milbourn.Cathy@epa.gov](mailto:Milbourn.Cathy@epa.gov)> wrote:

David I've asked but haven't heard back. Checking again.

Sent from my iPhone

On Aug 18, 2015, at 2:01 PM, "DesRoches, David" <[ddesroches@wnpr.org](mailto:ddesroches@wnpr.org)> wrote:

Hi Cathy, just checking back on this. Is anyone around today?

David DesRoches

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**From:** Milbourn, Cathy [<mailto:Milbourn.Cathy@epa.gov>]  
**Sent:** Monday, August 17, 2015 2:11 PM  
**To:** Deegan, Dave; DesRoches, David  
**Subject:** RE: Interview with Jim Jones?

Hi David and David: I can look into this but Jim Jones is out of the office for the next few weeks. I'm not sure who we have, but OSWER may have a piece of this.

Catherine C. Milbourn

U.S. EPA HQ

Office of the Administrator

Office of Media Relations

202-564-7849 (office)

202-420-8648 (mobile)

[Milbourn.cathy@epa.gov](mailto:Milbourn.cathy@epa.gov)

**From:** Deegan, Dave  
**Sent:** Monday, August 17, 2015 2:05 PM  
**To:** DesRoches, David  
**Cc:** Milbourn, Cathy  
**Subject:** RE: Interview with Jim Jones?

Hi David,

Sorry – for some reason your emails last week did not show up in my inbox.

I think best place to start is my colleague Cathy Milbourn (copied). I don't know that Jim Jones is the correct person but Cathy will be able to get you to someone who is familiar with PCBs and EPA's guidance regarding remediation, etc.

Dave

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Dave Deegan

U.S. EPA, New England Regional Office

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email: [deegan.dave@epa.gov](mailto:deegan.dave@epa.gov)



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**From:** DesRoches, David [mailto:[ddesroches@wnpr.org](mailto:ddesroches@wnpr.org)]

**Sent:** Monday, August 17, 2015 1:53 PM

**To:** Deegan, Dave

**Subject:** RE: Interview with Jim Jones?

Dave,

Sorry to be a pest, but just wondering if you're around and saw this?

David DesRoches

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**From:** DesRoches, David  
**Sent:** Friday, August 14, 2015 2:54 PM  
**To:** 'Deegan, Dave'  
**Subject:** RE: Interview with Jim Jones?

Dave,

Just checking to see if you got this email below? Hope all is well,

david

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**From:** DesRoches, David  
**Sent:** Thursday, August 13, 2015 5:56 PM  
**To:** 'Deegan, Dave'

**Subject:** Interview with Jim Jones?

Dave,

Could you set up an interview with Jim Jones or someone who knows about PCB remediation and authorized uses? I have some questions about EPA's regulations on PCB testing, removal and disposal, as well as EPA's understanding of health risks associated with PCBs. Would Jim be the best person to speak with about this? Thanks!

david

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**From:** Deegan, Dave [<mailto:Deegan.Dave@epa.gov>]  
**Sent:** Wednesday, March 25, 2015 3:35 PM  
**To:** DesRoches, David  
**Subject:** RE: EPA info re. Historical Production of PCBs (2 of 3)

2 of 3

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Dave Deegan

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<image002.jpg>

**From:** Deegan, Dave  
**Sent:** Wednesday, March 25, 2015 3:26 PM  
**To:** [ddesroches@wnpr.org](mailto:ddesroches@wnpr.org)  
**Cc:** Deegan, Dave  
**Subject:** EPA info re. Historical Production of PCBs

Hi David,

Re. your inquiry for historic production info related to PCB's, I have attached several documents described below.

As a general summary, Monsanto was the primary producer of PCBs in the U.S. Monsanto then sold PCBs to other companies for whichever use the companies had. Companies that used PCB oil in electrical equipment included but were not limited to General Electric, Westinghouse, Cornell Dubilier, and Aerovox. There are fewer available records regarding historical production/use of PCBs in non-liquid products (e.g., caulk, paint).

Some of the historic uses of PCBs include:

- Transformers and Capacitors
  - &#8226; Heat Transfer Equipment
  - &#8226; Hydraulic Fluids
  - &#8226; Paints, coatings, and sealants
  - &#8226; Fluorescent Light Ballasts
  - &#8226; Lubricating and Cutting Oils
  - &#8226; Insulation materials (foam rubber, felts)
  - &#8226; Caulking and grout
  - &#8226; Gaskets
  - &#8226; Roofing and Siding
  - &#8226; Carbonless Copy Paper
  - &#8226; Inks and Dyes
  - &#8226; Adhesives and Mastics

The first attachment is a partial scan of the “Monsanto list” with products and customers. The full 360 pp. listing of customers is document no. B2-093 in the 1998 PCB Disposal Amendment docket no. OPPTS-66009A (full report can be requested at [www.epa.gov/dockets](http://www.epa.gov/dockets)). The other two documents are from the late 1970’s and supported our PCB use prohibitions rule dated May 31, 1979 (docket no. OPPT-66008).

Thanks and Best Regards,

Dave

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Dave Deegan

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<image002.jpg>

My apologies, Dave! Thanks for getting back to me. Here's what I'm looking for:

The EPA was an agency in 1979 when PCBs were finally banned. I would think you guys have a list of companies that used PCBs in their materials and what those materials/products were, how prevalent they might be, etc. Whatever information you could share would be very helpful. I'm most interested in caulk companies, but other companies that used PCBs would also be helpful. Also, could you tell me the main manufacturer of PCBs during that time?

If there's anything else you need from me, please ask. If you can think of another resource that might be helpful for me, please let me know.

Thanks so much for your help!

David

David DesRoches

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